

## **Benefit Eligibility Verification For Full-Time Student Dependents Policy Effective October 1, 2009**

*If you are a benefited City of San Jose employee/retiree with child dependents between the ages of 19 and 24 this notification applies to you and your family*

The City of San José provides benefits coverage for unmarried over-age Dependents between ages 19 and 24 who are full-time students. The City requires employees and retirees to provide proof of their child's full-time student status in order to establish eligibility for coverage under the City's health, dental, vision, and EAP (actives only) plans through the following calendar year.

### **Qualifying Full-Time Student**

A full-time student is defined as an employee/retiree's over-age dependent between the ages of 19 and 24 who is enrolled as a full-time student.

Full time enrollment is defined as follows:

- Carrying 12 or more undergraduate units per semester or 12 or more undergraduate units per quarter, or 6 or more graduate units per semester or 6 or more graduate units per quarter, at an accredited college or university, or enrolled in a college or university on a full-time basis as defined by the school; or
- Enrolled in a technical, trade or occupational school on a full-time basis (as defined by the school).

### **Enrollment Information Required**

Proof of enrollment must indicate that the dependent is either:

1. Enrolled in 12 or more undergraduate units (6 units or more for graduate course work) during the fall term of the year in which Open Enrollment occurs, or the Spring semester of the year of eligibility. Acceptable documents include registration documents listing the number of units in which the student is enrolled, or verification of full-time enrollment submitted on official school letterhead or other official documents; or
2. Enrolled in a technical, trade or occupational school as a full-time student (full-time student as defined by the school) during the fall term (September – December) of the year in which Open Enrollment occurs, or the winter/spring term (January – June) of the year of eligibility. Acceptable documents include registration documents listing the number of units in which the student is enrolled, an invoice for tuition indicating the number of units in which the student is enrolled, or verification of full-time enrollment submitted on official school letterhead or other official school document.

### ***Retirees***

Retirement Services has a different frequency schedule for submitting verification. Please refer to the section "Verification of Eligibility" for details.

### **Enrollment Requirements for New and Newly Benefited Employees' Dependents**

The City requires all new and newly benefited employees to provide full-time student status verification for eligible over-age dependents if the employee wishes to enroll these dependents in the City's health, dental, vision, and EAP

plans. Verification must be provided with the benefit enrollment forms or immediately following on-line enrollment (*eWay* Self-Service) within the first 30 days of employment/eligibility.

If the new or newly benefited employee fails to provide FT student status verification for an eligible over-age dependent during the initial 30 day enrollment period, they may provide FT student verification to add their over-age dependents during any future Open Enrollment period in which the dependent child meets the eligibility for enrollment.

### ***Retirees***

Verification is due at the time of retirement.

### **Verification of Eligibility**

The City has a standardized process to gather student verification for employees and retirees. The City may, however, require proof of full-time student status at any time as this is a condition of enrollment for over-age dependents.

### ***Employees***

Employees will be typically required to submit proof of full-time student status each fall during the annual Open Enrollment period, which generally occurs the first two weeks in November. The deadline to submit student verification is **December 1<sup>st</sup> of each year**. Verification provided during this time will establish a dependent's eligibility for benefits coverage beginning on January 1<sup>st</sup> following the Open Enrollment period.

### ***Retirees***

Retirees will be required to submit proof of full-time student status each fall and again in the spring to qualify for health, dental, and vision benefits.

- ◆ The spring verification period is during the annual Open Enrollment period, which generally occurs the month of November. Verification is due no later than December 31<sup>st</sup> of each year.
- ◆ The fall verification period generally occurs in August. Verification is due no later than August 31<sup>st</sup> of each year.

### **Failure to Provide FT Student Status Verification**

The City may send an annual courtesy reminder to employees that identifies the cut-off date for verification and the date coverage will be lost if the verification is not received for the current Open Enrollment period. Generally, verifications during the annual Open Enrollment period will be effective January 1<sup>st</sup> of the following calendar year.

### ***Retirees***

- ◆ If fall full-time student verification is not received, insurance benefits will terminate effective September 1<sup>st</sup>.
- ◆ If spring full-time student verification is not received, insurance benefits will terminate effective January 1<sup>st</sup>.

### **Dependents Turning 19 Years of Age**

Employees/retirees will be eligible to continue coverage for a dependent that is enrolled in benefits at the time he or she turns age 19 provided full-time student verification is submitted.

### **Gain of Full-Time Student Status**

Employees and retirees may request enrollment when their child gains full-time student status between the ages of 19 and 24 within 30 days of initially entering school on a full-time basis. Coverage will be effective the first of the month following the request. Note: Dependents who turn 19 and provide student verification will not have a gap in coverage.

Employees/retirees who do not elect to enroll the student upon initial eligibility may request enrollment of an eligible full-time student within 30 days of enrollment in a qualified educational program or during any future annual Open Enrollment period. Student verification will be required for enrollment during the Open Enrollment period.

### **Benefit Continuation during Medical Leave from School (Michelle's Law)**

Employees/retirees may continue coverage for their child who is verified as a full-time student and requires a medically necessary leave of absence from school. The following requirements must be met:

- be a dependent child who is between the ages of 19 and 24 and enrolled as a full-time student immediately before the first day of the medical leave
- take a medical leave of absence from school due to injury, illness or medical condition
- provide written certification from his or her physician of the medical need for leave at least 30 days prior to a foreseeable leave or within 30 days after the start of an unforeseeable leave

### **Loss of Student Status Between the Ages of 19 and 24**

Employees/retirees are required to notify Human Resources/Retirement Services within 30 days of the loss of full-time student status, which includes a reduction in units, graduation, etc.

### **Submitting Mid-Year Changes**

Employees must notify Human Resources of his/her dependent's change in student status. A change in student status notification may be made by completing the *Health-Dental-Vision Enrollment/Change* form or *Request to Drop Dependent Coverage* form or may be submitted by letter. This change notice must be submitted to:

#### **For Employees:**

Mail to: City of San José – Human Resources  
200 E. Santa Clara St, 2<sup>nd</sup> Floor Wing  
San Jose, CA 95113-1905

Fax to: (408) 999-0862  
E-mail to: [benefits@sanjoseca.gov](mailto:benefits@sanjoseca.gov)

#### **For Retirees:**

Mail to: City of San José – Retirement Services  
1737 N. 1<sup>st</sup> St, Suite 580  
San Jose, CA 95112-4505

Fax to: (408) 392-6732  
E-mail to: [cristin.james@sanjoseca.gov](mailto:cristin.james@sanjoseca.gov)

### **Dependents Turning 24 Years of Age**

All child dependents will be terminated from the employee/retiree's health, dental, vision, and EAP (actives only) coverage on the first day of the month following the month in which the child turns age 24. Under this qualifying event, the dependent may be eligible for COBRA health, dental, vision and EAP (actives only) insurance continuation for a period not exceeding 36 months. Human Resources/Retirement Services will send notification of COBRA rights to the dependent at the employee/retiree's designated mailing address.

### **Questions?**

#### ***Employees***

If you have any questions or issues regarding this policy, please contact Employee Benefits at [benefits@sanjoseca.gov](mailto:benefits@sanjoseca.gov) or (408) 535-1285.

#### ***Retirees***

If you have any questions or issues regarding this policy, please contact Retirement Services at [cristin.james@sanjoseca.gov](mailto:cristin.james@sanjoseca.gov) or (408) 794-1017.